

Kerry P. Faughnan, Esq., NSB #.12204
P.O. Box 335361
North Las Vegas, NV 89033
(702) 301-3096
(702) 331-4222- Fax
Kerry.faughnan@gmail.com

Eric J. Troutman (*pro hac vice* forthcoming)
SQUIRE PATTON BOGGS (US) LLP
555 S. Flower Street, 31 Floor
Los Angeles, CA 90071
(213) 624-2500
(213) 623-4581 (fax)
eric.troutman@squirepb.com

Meghan A. Quinn (*pro hac vice* forthcoming)
SQUIRE PATTON BOGGS (US) LLP
2550 M Street, NW
Washington, DC 20037
(202) 457-6000
(202) 457-6315 (fax)
meghan.quinn@squirepb.com

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN NATIVIDAD, individually and on behalf of all other similarly situated,

Case No.: 2:21-cv-01863-RFB-NJK

Plaintiff.

V.

NEVADA HOLISTIC MEDICINE
LLC;

Defendant.

**DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION
OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

[SECOND REQUEST]

Defendant Nevada Holistic Medicine LLC (“Defendant”), by its attorneys, for its
nominated Motion for Extension of Time to respond to Plaintiff’s Complaint, states as
follows:

28 1. Plaintiff John Natividad (“Plaintiff”) filed a Complaint on October 8, 2021.

2. Defendant was served on October 11, 2021, making Defendant's response to the Complaint due on November 1, 2021.

3. Defendant previously requested, and this Court granted, a brief 14-day extension of time for Defendant to respond to the Complaint, making Defendant's response to the Complaint due on November 15, 2021. [ECF No. 10]

4. It has since become apparent that it would be in Defendant's best interest to obtain counsel with more extensive Telephone Consumer Protection Act and class-action expertise. Accordingly, Defendant is retaining Eric J. Troutman and Meghan A. Quinn of Squire Patton Boggs (US) LLP to serve as additional counsel.

5. Given that Defendant has recently retained additional counsel who requires time to review the file materials and prepare the appropriate response, Defendants request a 30-day extension of time to respond to the Complaint.

6. Granting Defendants a 30-day extension of time to respond to the Complaint will not unreasonably delay the litigation nor prejudice either party.

7. This is Defendant's second request for an extension of time.

8. Plaintiff's counsel agreed to this extension via email on November 15, 2021.

WHEREFORE, Defendant Nevada Holistic Medicine LLC respectfully requests, and Plaintiff does not oppose, that the Court grant Nevada Holistic Medicine LLC a thirty (30) day extension of time to respond to Plaintiff's Complaint, up to and including December 15, 2021.

/s/ *Kerry P. Faughnan*

Kerry P. Faughnan, Esq., NSB #12204
P.O. Box 335361
North Las Vegas, NV 89033
(702) 301-3096
(702) 331-4222- Fax
Kerry.faughnan@gmail.com

1 Eric J. Troutman (*pro hac vice* forthcoming)
2 SQUIRE PATTON BOGGS (US) LLP
3 555 S. Flower Street, 31 Floor
4 Los Angeles, CA 90071
(213) 624-2500
(213) 623-4581 (fax)
eric.troutman@squirepb.com

5 Meghan A. Quinn (*pro hac vice* forthcoming)
6 SQUIRE PATTON BOGGS (US) LLP
7 2550 M Street, NW
8 Washington, DC 20037
(202) 457-6000
(202) 457-6315 (fax)
meghan.quinn@squirepb.com

10 Attorneys for Defendant

11 IT IS SO ORDERED.

13
14 
15 Nancy J. Koppe
United States Magistrate Judge

16 Dated: November 16, 2021

17
18
19
20
21
22
23
24
25
26
27
28